

KATTEN MUCHIN ROSENMAN LLP
575 Madison Avenue
New York, New York 10022
(212) 940-8800
Attorneys for Defendants

Hearing Date: January 6, 2021
Time: 10:00 A.M.

Opposition Deadline: December 30, 2020

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

Reply Deadline: January 3, 2021

SECURITIES INVESTOR PROTECTION CORPORATION,)	
Plaintiff-Applicant,)	Adv. Pro. No. 08-01789 (SMB)
v.)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,)	SIPA Liquidation
Defendant.)	(Substantively Consolidated)
In re:)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,)	
Debtor.)	
IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff)	
Plaintiff,)	Adv. Pro. No. 12-01699 (SMB)
v.)	
ROYAL BANK OF CANADA; GUERNROY LIMITED; ROYAL BANK OF CANADA (CHANNEL ISLANDS) LIMITED; ROYAL BANK OF CANADA TRUST COMPANY (JERSEY) LIMITED; ROYAL BANK OF CANADA (ASIA) LIMITED; ROYAL BANK OF CANADA (SUISSE) S.A.; RBC DOMINION SECURITIES INC.; AND RBC ALTERNATIVE ASSETS, L.P.,)	
Defendants)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendants Royal Bank of Canada; Guernroy Limited; Royal Bank of Canada (Channel Islands) Limited; Royal Bank of Canada Trust Company (Jersey) Limited; Royal Bank of Canada Singapore Branch, as successor to Royal Bank of Canada (Asia) Limited; Banque SYZ, as successor to Royal Bank of Canada (Suisse) S.A.; RBC Dominion Securities Inc.; and RBC Alternative Assets, L.P. (collectively, “RBC”), by and through their undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, located at the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on January 6, 2021 at 10:00 a.m., seeking entry of an order granting Defendants’ Motion to Stay; for the reasons set forth in the Memorandum of Law in Support of Defendants’ Motion to Stay, the Declaration of Mark T. Ciani in Support of Defendants’ Motion to Stay, and accompanying exhibits, dated November 24, 2020, submitted herewith.

WHEREFORE, Defendants respectfully request that the Court enter an order granting the relief requested herein, in substantially the form attached as Exhibit C to the Declaration of Mark T. Ciani in Support of Defendants’ Motion to Stay, and such other and further relief as the Court deems just and appropriate.

Dated: November 24, 2020
New York, NY

KATTEN MUCHIN ROSENMAN LLP

/s/ Anthony L. Paccione

Anthony L. Paccione
Mark T. Ciani
575 Madison Ave
New York, New York 10026
Telephone: (212) 940-8800
anthony.paccione@katten.com
mark.ciani@katten.com

Attorneys for Defendants